

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

86-285

OFFICE OF
MANAGING DIRECTOR

JUL 15 1999

DOCKET FILE COPY ORIGINAL

Peter D. O'Connell, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Re: Request for Reduction of Regulatory Fees
Multimedia, Inc.
Fee Control No. 9809218835239012

Dear Mr. O'Connell:

This is in response to the request filed on behalf of Multimedia, Inc. for a reduction in the Fiscal Year (FY) 1998 regulatory fees assessed for VHF Television Satellite Station KNAZ-TV, Flagstaff, Arizona and 16 Broadcast Auxiliary stations.

You maintain that although KNAZ-TV is located in the Phoenix, Arizona, market, it does not serve Phoenix. You assert that KNAZ-TV should be regarded and assessed the regulatory fee for a non-top 100 or remaining market station. Multimedia, Inc. paid a total of \$31,451 in FY 1998 regulatory fees, for a VHF Television Station serving the 11th through 25th largest markets, and for the 16 Broadcast Auxiliary Stations.

On September 29, 1998, the Commission decided that for FY 1997 KNAZ-TV would be assessed a regulatory fee comparable to that of a VHF Station in the remaining market category. Absent significant changes in population or coverage area, KNAZ-TV would be considered as a remaining market station in succeeding years.

Accordingly, your petition is granted. Multimedia, Inc. has paid a total of \$31,451 in regulatory fees for KNAZ-TV and its Broadcast Auxiliary Stations. KNAZ is assessed FY 1998 regulatory fees of \$3,100 as a remaining market VHF station and \$176 for its 16 Broadcast Auxiliary stations. Thus, it is entitled to a refund of \$28,175. A check, made payable to the maker of the original check, and drawn in the amount of \$28,175, will be sent to you at the earliest practicable time.

Mr. Peter D. O'Connell

2.

If you have any questions concerning the refund, please call the Credit and Debt Management Center at (202) 418-1995.

Sincerely,



Mark Reger
Chief Financial Officer

98092/8835239012

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

September 17, 1998

WRITER'S DIRECT DIAL NUMBER

FACSIMILE
(202) 429-7049

(202) 429-3360

VIA BERRY BEST COURIER

Federal Communications Commission
Regulatory Fees
P.O. Box 358835
Pittsburgh, PA 15251-5835

Re: Regulatory Fee Payment - 1998
Station KNAZ-TV, Flagstaff, AZ
and
Request for Reduction in Regulatory Fee

Gentlemen/Ladies:

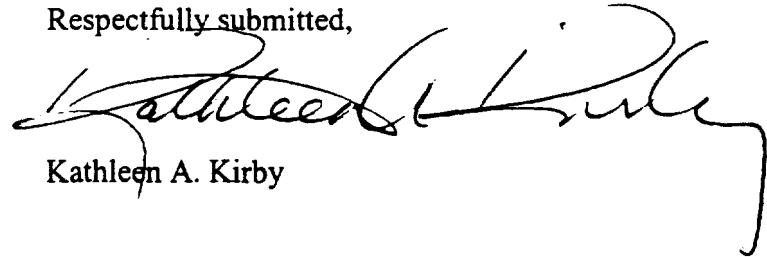
On behalf of Multimedia, Inc., licensee of station KNAZ-TV, we are filing herewith:

- (1) the required FCC Remittance Advice (Forms 159 and 159-C)
for the main station license and all associated auxiliary and other licenses;
and
- (2) a check in the amount of \$31,451.00 covering the combined fees that are
due pertaining to this station; and
- (3) a Petition for Reduction of Regulatory Fee.

Federal Communications Commission
September 17, 1998
Page 2

If any further information is needed, please contact the licensee or this office.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kathleen A. Kirby", written over a horizontal line.

Kathleen A. Kirby

Enclosures

cc: ✓ Office of the Managing Director
Federal Communications Commission
1919 M Street, NW, Room 450
Washington, DC 20554
Attn: Regulatory Fee Reduction Request

Brien Kennedy
Winnie Stolper
David Fleming, Esq.

In support of its Petition, KNAZ-TV submits that the “good cause” standard of Section 1.1166 of the Commission’s Rules has been met, and in support of such, declares the following:

1. In the case of stations that do not in fact serve the principal metropolitan areas of their assigned markets, it is the FCC’s policy to assess regulatory fees based on “the number of television households served” so that the stations will be charged “the same fee as stations serving markets with the same number of television households.”²

2. KNAZ-TV is a commercial VHF television station licensed to Flagstaff, Arizona, and is listed as within the Phoenix, Arizona, Designated Market Area (“DMA”) in the 1998 edition of the Television and Cable Factbook.³

3. The Phoenix DMA, as defined by the Factbook, is the seventeenth (17th) largest in the nation and includes 1,289,210 Nielsen DMA Television Households.⁴ According to the Commission’s schedule for 1998 regulatory fees, KNAZ-TV owes \$31,275.00 in regulatory fees, by virtue of its status as a Commercial VHF Station in Markets 11-25.⁵

4. KNAZ-TV has timely remitted the full \$31,275.00 in regulatory fees due, and accompanies such payment with this Petition for Reduction of Regulatory Fee.

5. In support of its request for a reduction in fees, KNAZ-TV represents that it does not in fact operate (nor serve the viewers) in the Phoenix, Arizona, television market. KNAZ-

² See In re Implementation of Section 9 of the Commissions Act Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year, Memorandum Opinion and Order, FCC 95-257, 10 FCC Rcd. 12759, ¶ 22 (1995) (hereinafter Memorandum Opinion and Order).

³ See Television & Cable Factbook, Volume 66, A-63, A-1 (Albert Warren, ed., 1998).

⁴ Id. at A-1.

⁵ See FY 1998 Mass Media Regulatory Fees, Public Notice, Aug. 1, 1998, at 7.

TV is licensed to and located in Flagstaff, Arizona, approximately 135 miles from Phoenix, and is located well outside of the Phoenix metropolitan area. See Exhibit 1 (portraying signal coverage).

6. In early 1997 KNAZ-TV submitted to the Commission an engineering study in conjunction with its license assignment. The study focused on the potential for Grade B contour overlap between KNAZ-TV and KPNX-TV, a major television station serving the entire Phoenix-Mesa television viewing area. The engineering report from this study, relevant portions of which are attached as Exhibit 2, concluded that as a result of the mountainous terrain lying between the two transmitters, the viewer population living in the overlapping area was *de minimis*: 0.03% of the total population within KPNX-TV Grade B contour and 0.28% of the total population within the KNAZ-TV Grade B contour. See Exhibit 2, at 8-9. As such, the KNAZ-TV transmitter, which is located approximately eighteen miles southeast of Flagstaff, and approximately 115 miles from Phoenix, does not provide even a Grade B signal to the Phoenix metropolitan area. Likewise, Phoenix television stations do not provide Grade B signals to Flagstaff or the area surrounding Flagstaff.

7. KNAZ-TV is not carried by cable systems serving the Phoenix metropolitan area. See Exhibit 3 (1998 Television and Cable Factbook listing all programming carried by cable operators serving the Phoenix cable area). Additionally, independent demographic and financial studies indicate that KNAZ-TV has no measurable audience share in the Phoenix market. See Exhibit 4.⁶

⁶ BIA Publications, Inc., Investing in Television. 1996 Market Report (May 1996).

8. Exhibit No. 1 reflects that KNAZ-TV serves 77,750 cable TV households and 36,530 non-cable TV households for a total of 114,280 households. This figure is much smaller than the 259,650 television households that are located within the Savannah, Georgia, television market, the 100th largest television market in the nation.⁷ VHF stations located in markets smaller than Savannah are required to pay a regulatory fee of only \$3,100.00.⁸ KNAZ-TV serves such a smaller market and thus should be assessed a comparable reduced regulatory fee.

9. In addition to Commission policy as set out in its Memorandum Opinion and Order, KNAZ-TV also cites, as precedent for this request for reduction of fees, the following Commission actions: Letter from Marilyn J. McDermett, Associate Managing Director for Operations to Thomas J. Hutton, February 14, 1996 (granting a fee reduction for station KMOH-TV, Kingman, Arizona); Letter to Bradford D. Cagey, February 10, 1995; Letter to Dr. Robert J. Pelletier, February 10, 1995.

Pursuant to the facts set forth above and in accordance with the policy stated in the Memorandum Opinion and Order, KNAZ-TV requests a reduction in its regulatory fees for fiscal year 1998 from \$31,275.00 to \$3,100.00, which represents fees assessed on VHF stations in markets below the top 100 (i.e., those serving fewer than 259,650 television households). KNAZ-TV requests a refund of \$28,175.00 which reflects the difference between the 1998 regulatory fee assessment and the amount charged to stations in the "Remaining Market" category. KNAZ-TV requests that this refund be tendered at the earliest possible date.

⁷ See supra note 4.

⁸ See supra note 5.

Additionally, as requested in its 1997 petition, KNAZ-TV requests that it be considered as a "Remaining Market" for purposes of regulatory fee assessments in succeeding years.

Respectfully submitted,

Multimedia, Inc.

By: _____
Peter D. O'Connell
Kathleen A. Kirby

WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006
(202) 429-7000

Its Attorneys

September 17, 1998

Exhibit 1

Arizona—Flagstaff

KNAZ-TV Ch. 2

Network Service: NBC.

Licensee: Multimedia Inc., 1100 Wilson Blvd., Arlington, VA 22234.

Studio: 2201 N. Vickey St., Flagstaff, AZ 86001.

Mailing Address: Box 3360, Flagstaff, AZ 86003.

Phone: 520-526-2232. **Fax:** 520-526-8110.

Technical Facilities: Channel No. 2 (54-60 MHz). Authorized power: 20-kw visual, 5-kw aural. Antenna: 1540-ft. above av. terrain, 284-ft. above ground, 8684-ft. above sea level.

Latitude 34° 58' 06"
Longitude 111° 30' 28"

Transmitter: Mormon Mountain, 18-mi. SSE of Flagstaff.

FCC Proposed Digital Facilities: Ch. 22, 1000.0-kw, 1600.6-ft. above av. terrain.

Multichannel TV Sound: Stereo only.

Satellite Earth Station: Harris, 6-meter; Harris receivers.

News Services: AP, NPS.

Ownership: Gannett Broadcasting Group (Group Owner).

Began Operation: May 2, 1970. Sale to present owner from Grand Canyon TV Co. approved by FCC May 22, 1997. Transfer of control from Alfred Greenfield, Receiver, to W. A. Franko, Robert Johnson, John Michaels & Gene Gawthrop approved by FCC May 7, 1992. Sale to Grand Canyon TV Co. approved by FCC November 16, 1988 (*Television Digest*, Vol. 29:3). Transfer of control to individual shareholders of Capitol approved by FCC January 5, 1984. Sale to Capitol Bcstg. Co. by Wendell Elliot Jr., et al., approved by FCC January 7, 1981.

Represented (sales): Katz Continental Television.

Represented (legal): Dow, Lohnes & Albertson.

Personnel:

Don Robbins, Vice President & General Manager.

Stan Koplowitz, General Sales Manager.

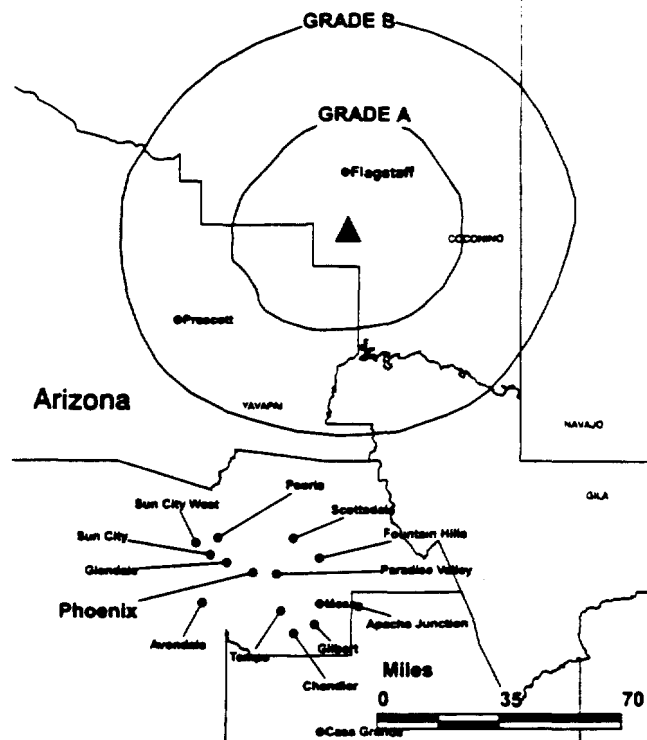
Nick Matesi, News Director.

Marge Divine, Program Director.

Jon Koger, Chief Engineer.

Highest 30 Sec. Rate: \$300.

KNAZ-TV BPCT-810317KF GRANTED: 6/18/81



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City of License: Flagstaff. **Station DMA:** Phoenix. **Rank:** 17.

Circulation © 1997 Nielsen. Coverage based on Nielsen study.

Grand Total	Cable TV Households	Non-cable TV Households	Total TV Households
Estimated Station Totals*	77,750	36,530	114,280
Average Weekly Circulation (1997)	30,776	12,875	43,651
Average Daily Circulation (1997)			21,777

Station DMA Total	Cable TV Households	Non-cable TV Households	Total TV Households
Estimated Station Totals*	77,750	36,530	114,280
Average Weekly Circulation (1997)	30,776	12,875	43,651
Average Daily Circulation (1997)			21,777

*Estimated station totals are sums of the Nielsen TV and Cable TV household estimates for each county in which the station registers viewing of more than 5% as per the Nielsen Survey Methods.

AL

22

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Exhibit 2

**ATTACHMENT 1
ENGINEERING STATEMENT
RE: LOCATIONS OF GRADE B CONTOURS
TELEVISION BROADCAST STATIONS
KPNX CHANNEL 12 MESA, ARIZONA
KNAZ-TV CHANNEL 2 FLAGSTAFF, ARIZONA**

INTRODUCTION

This statement was prepared on behalf of Multimedia, Inc. ("Multimedia"), the proposed buyer of television broadcast station KNAZ-TV Flagstaff, AZ. Multimedia is affiliated with the licensee of television broadcast station KPNX Mesa, AZ and since there is the potential for Grade B contour overlap between the two stations, Multimedia must address the conditions outlined in Section 73.3555 of the Commission's Rules.

Section 73.3555(b) TELEVISION CONTOUR OVERLAP (DUOPOLY) RULE states: "No license for a TV broadcast station shall be granted to any party (including all parties under common control) if the grant of such license will result in overlap of the Grade B contour of that station (computed in accordance with 73.684) and the Grade B contour of any other TV broadcast station directly or indirectly owned, operated or controlled by the same party."

An analysis of the potential for Grade B contour overlap was conducted by the office of the undersigned, with the contours computed in accordance with Section 73.684 of the Commission's Rules. Based on the standard prediction method described in that

section, the Grade B contour of KPNX overlaps the Grade B contour of KNAZ-TV (the station Multimedia is seeking to acquire). Section 73.684(f) of the Rules does, however, recognize that in cases where terrain in one or more directions departs widely from the average 3 to 16 kilometer sector, or where the terrain is so extreme that a mountain ridge may indicate the practical limit of service, supplemental showings concerning contour distances determined by other means may be made.

This statement and the attached figures, prepared in support of a request for a waiver of Section 73.3555(b) of the Commission's Rules, present an analysis of the potential for overlap of the Grade B contours of KPNX, Mesa, AZ and KNAZ-TV Flagstaff, AZ. The analysis provides Grade B contour data using the standard prediction method and an alternative method that is permitted, as described in Section 73.684 (f) of the Rules.

The supplemental showing is based on a technical analysis utilizing the National Telecommunications and Information Administration's Irregular Terrain Model (ITM), computer program version 1.2.2, in the point-to-point mode. Terrain analysis using the ITM model has been submitted to the Commission on numerous occasions. Version 1.2.2 of the ITM model was used in this case because the Commission's staff, acting on their own motion, in a case involving Medford and Eugene, OR utilized version 1.2.2 of the ITM model to perform a technical analysis of Grade B contour overlap in preference to version 1.2.1 that was used by the proponent in that case. That case, BALCT-

921201KF and BALCT-921201KG, involved the assignment of KDRV(TV) Medford, by Sunshine Television, Inc., to Soda Mountain Broadcasting, Inc., the licensee of KEZI(TV) Eugene, OR. That case is hereinafter referred to as Sunshine. In a similar case involving the assignment of television station KEVU Eugene, OR to California Oregon Broadcasting, Inc. ("COBI"), licensee of television broadcast station KOB! Medford, OR, the same technical analysis, version 1.2.2 of the ITM model was employed. Case BALCT-940124KG will be hereinafter referred to as COBI. The result of the Commission's analysis as noted in the Memorandum Opinion and Order in Sunshine was that the overlap based on the use of the ITM Model, although not de minimis, was within the range that has been authorized in previous cases and therefore the waiver request was granted. In the COBI case, the Commission cited their own technical analysis using version 1.2.2 of the ITM Model as the basis for determining contour overlap and accordingly granted the waiver request.

GRADE B CONTOURS - STANDARD PREDICTION METHOD

Attached to this statement as Figure 1 is a map showing the Grade B contours of KPNX and KNAZ-TV. The contour distances were predicted every forty-five degrees of azimuth using the standard prediction method described in Section 73.684 of the Commission's Rules. The 3 to 16 kilometer terrain data for all radial azimuths were calculated using a computer data base system to retrieve and average stored topographic data. The data used is the NGDC 30 Second Point Height Data File and the method of average calculation is the same as that specified in Docket 84-705 and

Section 73.312 of the FCC Rules.

The Grade B service areas and the areas of Grade B overlap shown on Figure 1 were analyzed for population, and for area in square kilometers. The results of those analyses are tabulated on Figure 2. The population was determined by a computer database system which tallies the population of the 1990 Census blocks and subgroups lying within a defined area. The areas were determined by measuring the map areas with a polar planimeter and converting the land area in square inches to land area in square kilometers by multiplying by a factor based on the scale of the map.

The assignment application to which this statement is attached will also include the acquisition of television broadcast station KMOH-TV Kingman, AZ by Multimedia. Attached as Figure 1A is a map showing the predicted Grade B contours of KMOH-TV in relation to the predicted Grade B contours of KPNX and KNAZ-TV. There is no overlap of the Grade B contours of KMOH-TV with either KPNX or KNAZ-TV.

SUPPLEMENTAL CONTOUR SHOWING

Utilizing the standard prediction method described in Section 73.684 of the FCC Rules, the proposed acquisition of KNAZ-TV by Multimedia will result in Grade B contour overlap as shown on Figure 1. Section 73.684 of the Rules describes contour prediction based on standard prediction methods using the F(50,50) estimated field strength curves in the FCC Rules. Those curves assume terrain with an average roughness height

factor of 50 meters. Attached as Figure 3 is a series of profile graphs showing a sample of the terrain in the area between the transmitter sites. The graphs demonstrate the ruggedness of the terrain and show numerous high ridges blocking line-of-sight transmissions in many directions. The profile graphs were prepared from terrain data extracted from the USGS 30 Second Point Height Data File. The terrain data is averaged at each point along a radial using the linear interpolation method described in the FCC rules. Since the terrain throughout the KPNX/KNAZ-TV service area departs widely from the FCC prediction standard, an alternative prediction method and supplemental Grade B contour showing is appropriate, as the FCC concluded in Sunshine and in COBI.

The FCC has on several occasions, such as in Sunshine and COBI, cited above, accepted supplemental showings of contours where the potential for overlap exists. The ITM model of radio frequency propagation is an implementation of the Longley-Rice model which has been in general use for many years. In Sunshine and COBI, the ITM program was employed by the proponents and the FCC in a point-to-point mode of calculation, predicting the field strength at various locations along a radial from the transmitter site. In addition, the nature of the intervening terrain and the presence of other factors such as urban clutter and/or vegetation loss may be considered to adjust the estimated field strength. The extent of service was defined by determining the distance along a path beyond which line-of-sight no longer exists and at which point the median value of the adjusted predicted signal falls below the level in question. This

method, though based on the precise calculation of field strength provided by the ITM prediction method, may require a significant degree of individual judgement in assessing the non-computed adjustments and median level.

In this report, the distance to the Grade B contours from the pertinent stations was predicted using the method described above, the method used by the FCC in Sunshine and COBI. The NTIA-ITM Irregular Terrain model, version 1.2.2, was used as the field strength prediction routine in a computer program designed to simulate the method described by the FCC in the Memorandum Opinion and Order in Sunshine and in the decision in COBI. In the computer program written for this particular case, the field strength is predicted along a radial path, starting approximately one mile from the transmitter, and at fixed intervals of 0.2 miles along the remainder of the radial path. Other parameters which may be adjusted in the ITM program were set at the values recommended by NTIA. A complete tabulation of the ITM program input parameters common to all calculations is attached as Table 1.

The terrain data used by the computer program written for this case is the same 30 Second Point Height Data used to prepare the profile graphs shown in Figure 3. Averaging the terrain data by the FCC linear interpolation method, and the inherent limitations of the database itself, both limit the absolute terrain accuracy. This limitation results in a calculated field strength different from that which would be calculated if the precise elevations were used at each point along a radial path. This "error", however,

tends to reduce the field strength change between line-of-sight and the following shadowed points.

When the terrain database does not precisely match a terrain peak, both the actual elevation from below the peak and the averaging with other lower points tend to return a lower than actual elevation. For a point that is still determined to be in line-of-sight there is no difference in the signal level. For following points in valleys, however, the terrain limitation and averaging works in the opposite direction, returning an elevation that is generally higher than actual. The ITM model then calculates a slightly higher field strength based on the effective reduction in the shadowing (lower peaks and higher valleys) used in the calculation. The end result is that the median field strength along a path is overestimated and using this overestimated value results in a greater distance to median Grade B contour. The use of actual terrain data along paths would tend to show lower signal levels and reduced distances to Grade B contours.

The computer program generated a field strength versus distance graph for each of the radial directions of interest. Those radials were chosen to cover the entire expanse of the predicted KPNX/KNAZ-TV Grade B overlap area with a step size of 5 degrees. The graphs attached as Figures 4 and 5 show the ITM predicted signal strength for stations KPNX and KNAZ-TV along each path and also the inverse distance predicted signal level. The distances to the terrain obstructed Grade B contours was judged to be the point at which the predicted field strength median value fell below the

Grade B level. The median value was determined in a 20 kilometer span of predicted field strength positioned along a radial. A "window" covering a 20 kilometer span was moved outward along the radial to establish the point at which the median value of the 20 kilometer window fell below Grade B level. The field strength graphs show the final window span and the resulting distance at which the median value fell below Grade B.

The terrain limited Grade B contour distances determined by the use of the ITM computer model and the field strength versus distance graphs of Figures 4 and 5 are tabulated on Figure 6 for KPNX and KNAZ-TV. Those distances were plotted on the map of Figure 7 and connected by an interpolation method to establish a smooth curve Grade B contour.

The map of Figure 7 shows the Grade B contours of KPNX and KNAZ-TV based on the technical analysis using the ITM Model. The terrain limited Grade B service areas and the resulting overlap as shown on Figure 7 were analyzed for population and area in square kilometers. The results of the analysis are tabulated on Figure 8.

The population within the overlap area, 560 is 0.03% of the total population of 2,235,960 within the KPNX Grade B contour, and 0.28% of the total population of 202,030 within the KNAZ-TV Grade B contour. The land area within the overlap area

is 314 square kilometers, 0.76% of the total within the KPNX Grade B contour, 41,490 square kilometers and 0.71% of the total within the KNAZ-TV Grade B contour, 44,060 square kilometers. The population in the overlap area is de minimus (less than 1%) when compared with the Grade B totals of both KPNX and KNAZ-TV. The land area figure is also de minimus when compared to the KPNX and KNAZ-TV Grade B contours.

The method of analysis for determining the population and area figures shown on Figure 8 is the same as that described in the preceding section covering the analysis of contours and overlap area using the standard prediction method.

CONCLUSION

Television broadcast stations KPNX and KNAZ-TV operate in areas of rugged terrain with variations in terrain of several thousand feet throughout the service areas. In the areas of predicted Grade B overlap, the terrain departs widely from the average 3 to 16 kilometer sector and with the rare exception of a path directly along a river valley, essentially all transmission paths are interrupted by terrain obstructions. In this environment, clearly the standard FCC field strength prediction method is inappropriate.

The best alternative prediction method, that is fully recognized and utilized by the FCC, employs the NTIA ITM Model. That method has been used to provide the information in this statement. All such methods have their limits, however, in this case the limitations tend to over estimate the Grade B contour distance and the resulting

contour overlap. The contour overlap that remains, even for this conservative estimation, is a small fraction of the actual Grade B service areas.

Respectfully submitted,
LOHNES AND CULVER



Frederick D. Veihmeyer

January, 1997

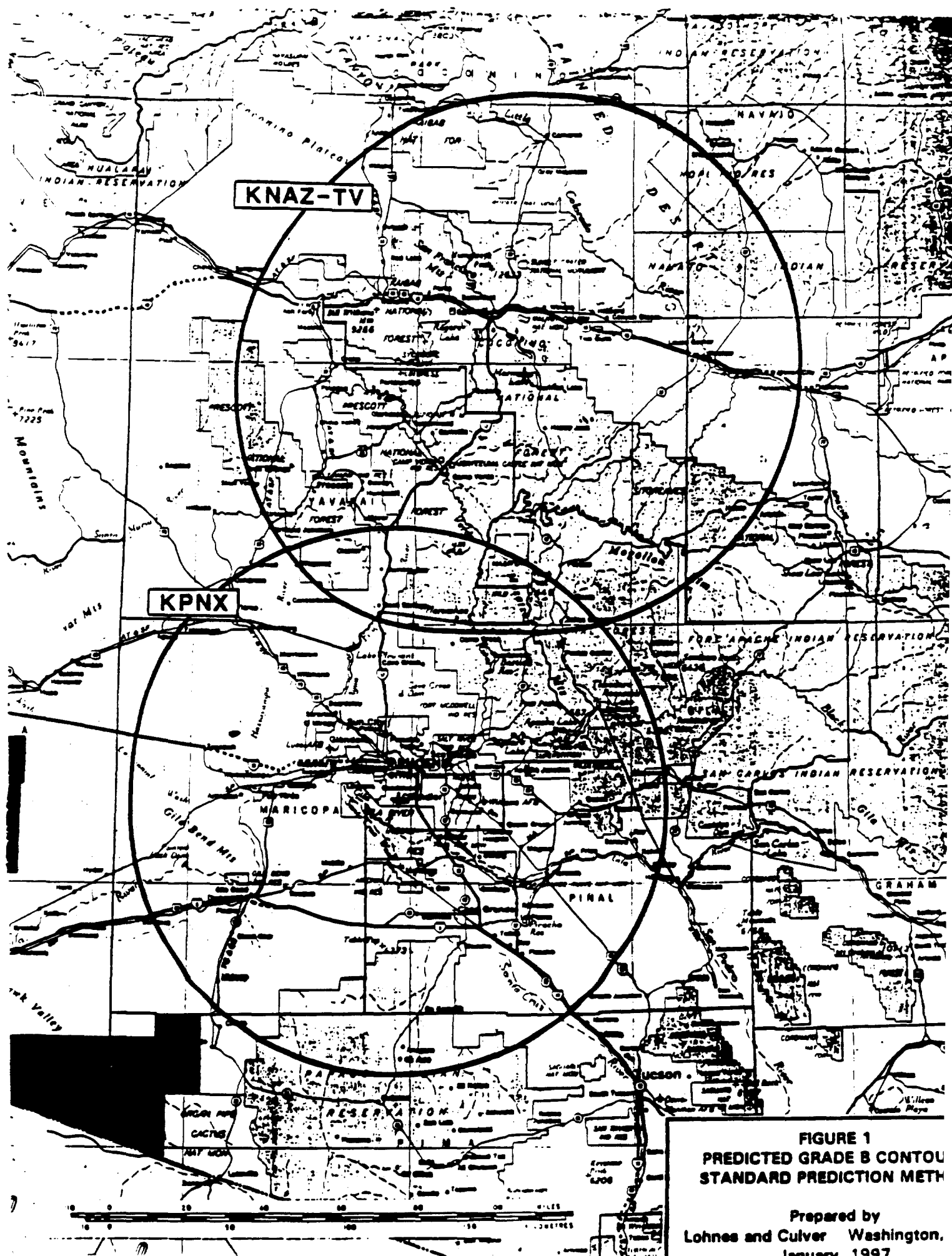


FIGURE 2
POPULATION AND AREA DATA
GRADE B CONTOURS
STANDARD PREDICTION METHOD
KPNX 316KW 1781 FT. AAT CH. 12
MESA, ARIZONA
KNAZ-TV 100KW 1601 FT. AAT. CH. 2
FLAGSTAFF, ARIZONA

POPULATION

	<u>1990 CENSUS</u>
KPNX - Grade B	2,235,960
KPNX/KNAZ-TV Overlap	4,530(0.20%)
KNAZ-TV Grade B	202,030
KNAZ-TV/KPNX Overlap	4,530(2.24%)

AREA

	<u>SQUARE KILOMETERS</u>
KPNX - Grade B	41,490
KPNX/KNAZ-TV Overlap	3,900(9.4%)
KNAZ-TV Grade B	44,060
KNAZ-TV/KPNX Overlap	3,900(8.85%)

Prepared by
Lohnes and Culver Washington, D.C.
January, 1997

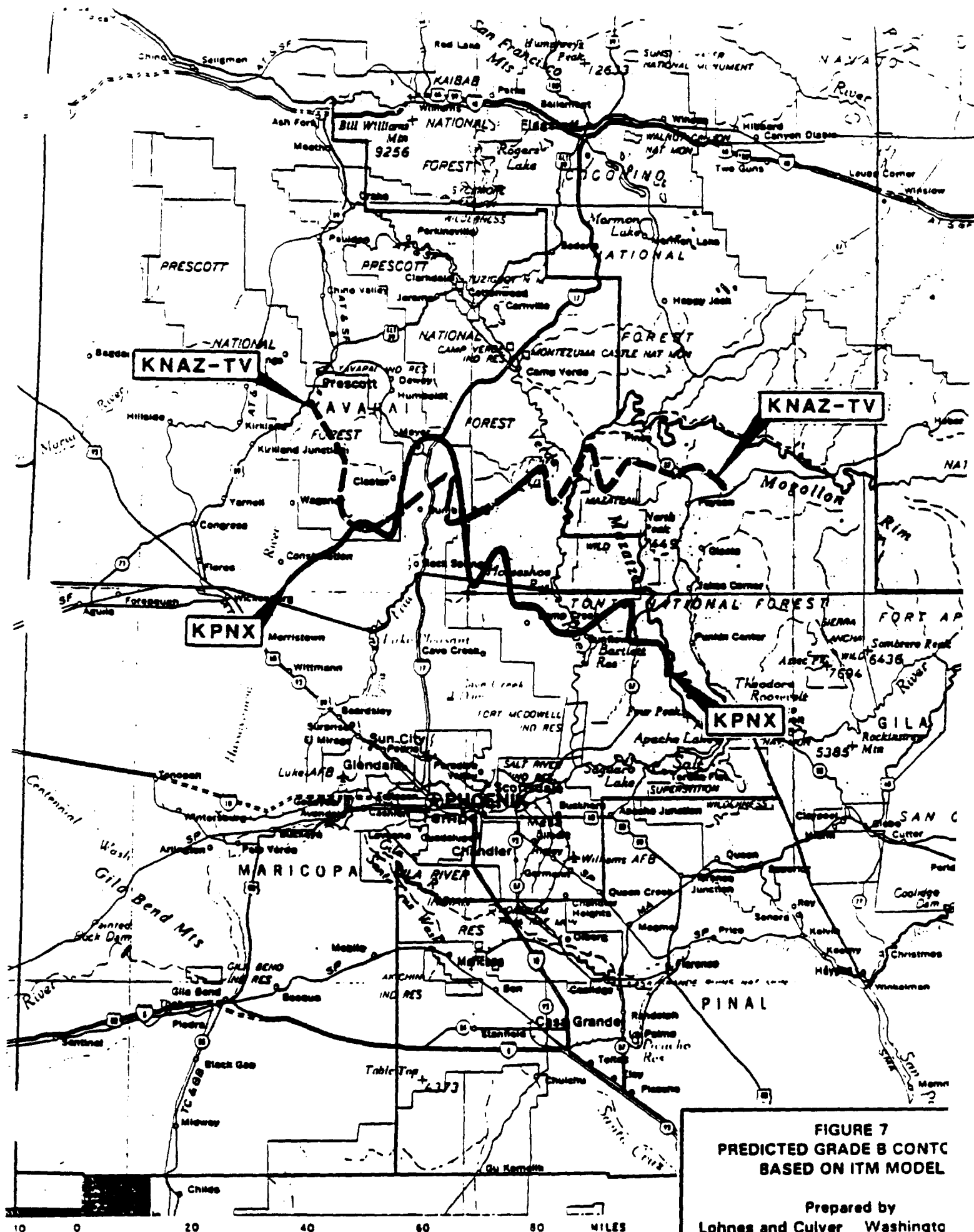


FIGURE 7
PREDICTED GRADE 8 CONTC
BASED ON ITM MODEL

Prepared by
Lohnes and Culver Washington
January, 1997

Exhibit 3

PAYSON—Mark Twain Cablevision, Suite 100, 1435 S. Bellaire St., Denver, CO 80222. Phone: 303-566-5600. Fax: 303-566-5774. Serves Coconino & Gila. Also serves Mesa, Pinal, Mohave, Oxbow Estates, Round Valley, Deer Valley. ICA: AZ0024.

TV Market Ranking: Outside TV Markets. Franchise award date: October 1, 1981. Franchise expiration date: September 1, 1996. Began: January 1, 1955.

Channel capacity: 41 (not 2-way capable). Channels available but not in use: 6.

Basic Service

Subscribers: 4,759 (02/10/95).

Programming (received off-air): KAET (P), KNXV-TV (A), KPHO-TV (C), KPNX (N), KSAZ-TV (F), KTVK (I), KUTP (U) Phoenix; 12 channels.

Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; A & E; C-SPAN; CNN; Cartoon Network; Country Music TV; Discovery Channel; ESPN; Family Channel; Headline News; Lifetime; MTV; Nashville Network; Nick at Nite; Nickelodeon; QVC; Sci-Fi Channel; The Weather Channel; Trinity Bcstg. Network; Turner Network TV; USA Network; VH1; ValueVision. Current originations: Public access.

Fee: \$49.45 installation; \$25.13 monthly; \$3.00 converter.

Pay Service 1

Pay Units: 234 (02/10/95).

Programming (via satellite): Disney Channel; HBO; Showtime; The Movie Channel.

Fee: \$7.95 monthly.

Pay Service 2

Pay Units: 437 (02/10/95).

Programming (via satellite): HBO.

Fee: \$10.00 monthly.

Pay Service 3

Pay Units: 522 (02/10/95).

Programming (via satellite): Showtime.

Fee: \$8.95 monthly.

Pay Service 4

Pay Units: 423 (02/10/95).

Programming (via satellite): The Movie Channel.

Fee: \$8.95 monthly.

Local advertising: Yes. Available in character-generated programming. Rates: \$200.00/Hour.

Program Guide: TV Blue Print.

Equipment: Phasecom & Scientific-Atlanta headend; Scientific-Atlanta & Theta-Com amplifiers; CCS Hatfield & Theta-Com cable; Sony cameras; Regency & Scientific-Atlanta set top converters; AFC satellite antenna.

Miles of plant: 103.0 (coaxial). Additional miles planned: 10.0 (coaxial). Homes passed: 6,406.

Manager: Phil Hopkins. Chief technician: Bill Cise. Marketing & program director: Randy Roberson.

City fee: 2% of gross.

Ownership: Fanch Communications Inc. (MSO).

Note: Current information not available.

PEACH SPRINGS—Wander Cable Television, Box 1594, Gualala, CA 95445. Phone: 707-844-4111. Fax: 707-884-4116. County: Mohave. ICA: AZ0071.

TV Market Ranking: Outside TV Markets. Franchise award date: July 27, 1989. Franchise expiration date: N.A. Began: January 1, 1991.

Channel capacity: 40 (not 2-way capable). Channels available but not in use: 15.

Basic Service

Subscribers: 125 (06/18/92).

Programming (received off-air): KVVU-TV (F), Las Vegas; KAET (P), KPHO-TV (C), KPNX (N), KSAZ-TV (F), KTVK (I) Phoenix. Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; CNN; Country Music TV; Discovery Channel; ESPN; Family Channel; Headline News; Home Shopping Network; MTV; Nashville Network; Nickelodeon; Trinity Bcstg. Network; USA Network; VH1.

Fee: \$15.00 installation; \$17.00 monthly; \$15.00 additional installation.

Pay Service 1

Pay Units: N.A.

Programming (via satellite): Disney Channel; Encore; The Movie Channel.

Fee: \$7.00 monthly (Encore), \$8.00 monthly (Disney), \$10.00 monthly (TMC).

Miles of plant: 7.0 (coaxial). Homes passed: 335.

Manager: James Monroe.

Franchise fee: 3% of gross.

Ownership: Wander Telecommunications (MSO). Purchased from Phoenix Cable Inc. October 22, 1996.

Note: Current information not available.

PERRYVILLE—Wander Cable Television, Box 1594, Gualala, CA 95445. Phone: 707-884-4111. Fax: 707-884-4116. County: Maricopa. ICA: AZ0078.

TV Market Ranking: Outside TV Markets. Franchise award date: March 23, 1990. Franchise expiration date: March 23, 2005. Began: January 1, 1991.

Channel capacity: 60. Channels available but not in use: N.A.

Basic Service

Subscribers: 163 (05/31/96).

Programming (received off-air): KAET (P), KNXV-TV (A), KPAZ-TV (T), KPHO-TV (C), KPNX (N), KSAZ-TV (F), KTVK (I), KTVW-TV (S), KUTP (U) Phoenix.

Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; CNN; Country Music TV; Discovery Channel; ESPN; Family Channel; Headline News; Home Shopping Network; MOR Music; MTV; Nashville Network; Nickelodeon; Prevue Channel; Turner Network TV; USA Network; VH1.

Fee: \$25.00 installation; \$17.00 monthly; \$15.00 additional installation.

Pay Service 1

Pay Units: N.A.

Programming (via satellite): Disney Channel; Encore; HBO; Showtime; The Movie Channel.

Fee: \$7.00 monthly (Encore), \$8.00 monthly (Disney), \$10.00 monthly (Showtime or TMC), \$11.00 monthly (HBO).

Homes passed: 200. Total homes in franchised area: 1,000.

Manager: James Monroe.

Franchise fee: 5% of gross.

Ownership: Wander Telecommunications (MSO). Purchased from Phoenix Cable Inc., October 22, 1996.

PHOENIX—Cox Cable, 17602 N. Black Canyon Hwy., Phoenix, AZ 85023-2304. Phone: 602-866-0072. Fax: 602-548-0756. County: Maricopa. Also serves Ahwatukee, Apache Country Club, Apache Wells, Buckeye, Chandler, East Mesa, Fountain Hills, Glendale, Golden Hills, Goodyear, Guadalupe, Leisure World, Litchfield Park, Maricopa County (portions), Mesa, Paradise Valley, Peoria, Scottsdale, Sun City, Sun City West, Sun Lakes, Surprise, Tempe, Youngtown. ICA: AZ0001.

TV Market Ranking: 43 (Ahwatukee, Apache Country Club, Apache Wells, Chandler, East Mesa, Fountain Hills, Glendale, Golden Hills, Goodyear, Guadalupe, Leisure World, Litchfield Park, portions of Maricopa County, Mesa, Paradise Valley, Peoria, Phoenix, Scottsdale, Sun City, Sun City West, Sun Lakes, Surprise, Tempe, Youngtown). Outside TV Markets (Buckeye, portions of Maricopa County). Franchise award date: N.A. Franchise expiration date: N.A. Began: January 1, 1960.

Channel capacity: 43 (2-way capable; operating 2-way). Channels available but not in use: None.

Basic Service

Subscribers: 582,267 (06/02/97).

Programming (received off-air): KAET (P), KNXV-TV (A), KPAZ-TV (T), KPHO-TV (C), KPNX (N), KSAZ-TV (F), KTVK (I), KTVW-TV (S), KUTP (U) Phoenix; allband FM. Planned programming (via microwave): KTTV (F) Los Angeles.

Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; A & E; American Movie Classics; C-SPAN; C-SPAN 2; CNBC; CNN; Cartoon Network; Comedy Central; Court TV; Discovery Channel; E! Entertainment TV; ESPN; EWTN; Family Channel; Fox Sports West; Gems Television; Headline News; Knowledge TV; Lifetime; MTV; Nashville Network; Nickelodeon; Odyssey; QVC; Sci-Fi Channel; Telemundo; The Weather Channel; Travel Channel; USA Network; VH1.

Current originations: Time-weather; news-ticker; public access; educational access; government access.

Fee: \$65.00 installation; \$10.95 monthly; \$9.95 additional installation.

Pay Service 1

Pay Units: 202,200 (06/01/91).

Programming (via satellite): Cinemax; Disney Channel; HBO; Showtime; The Movie Channel.

Fee: \$7.72 monthly (Cinemax or Disney), \$8.95 monthly (Showtime or TMC), \$10.95 monthly (HBO).

Pay-Per-View

Addressable homes: 144,353 (01/01/93). Viewers Choice.

Fee: \$4.95.

Interactive Services

Burglar alarm; fire alarm.

Program Guide: TV Times.

Equipment: Ameco headend; Ameco amplifiers; Jerrold & Tocom addressable set top converters; Scientific-Atlanta satellite antenna; Scientific-Atlanta satellite receivers.

Miles of plant: 6725.0 (coaxial); 700.0 (fiber optic). Homes passed: 1,072,456.

Manager: Gregg Holmes. Chief technician: Alan Sparks. Program director: Joan Reichman. Marketing director: Paul Gregg.

Ownership: Cox Communications Inc. (MSO).

PHOENIX (northwestern portion)—Insight Communications, 21200 N. Black Canyon Hwy., Phoenix, AZ 85027. Phone: 602-582-8282. Fax: 602-582-9649. County: Maricopa. ICA: AZ0011.

TV Market Ranking: 43. Franchise award date: N.A. Franchise expiration date: February 1, 1999. Began: January 1, 1981.

Channel capacity: 54 (not 2-way capable). Channels available but not in use: 3.

Basic Service

Subscribers: 11,600 (06/05/97).

Programming (received off-air): KAET (P), KASW (F.W), KNXV-TV (A), KPAZ-TV (T), KPHO-TV (C), KPNX (N), KSAZ-TV (F).

KTVK (I), KTVW-TV (S), KUTP (U) Phoenix; KUSK (I) Prescott. Programming (via microwave): Fox Sports Arizona.

Programming (via satellite): WTBS (I) Atlanta; WGN-TV (W) Chicago; Learn Channel. Current originations: Educational access. Fee: \$44.41 installation; \$25.50 monthly; \$0.73 converter; \$19.18 additional installation.

Expanded Basic Service

Subscribers: 10,448 (06/05/97).

Programming (via satellite): A & E; American Movie Classics; BET; C-SPAN; C-SPAN 2; CNBC; CNN; Comedy Central; Country Music TV; Discovery Channel; E! Entertainment TV; ESPN; ESPN 2; Family Channel; Galavision; Headline News; Home Shopping Network; Lifetime; MTV; Nashville Network; Nick at Nite; Nickelodeon; Prevue Channel; QVC; The Weather Channel; Travel Channel; Turner Network TV; USA Network; VH1.

Fee: \$15.25 monthly.

Pay Service 1

Pay Units: 894 (06/05/97).

Programming (via satellite): Cinemax.

Fee: \$10.95 monthly.

Pay Service 2

Pay Units: 824 (06/05/97).

Programming (via satellite): Disney Channel.

Fee: \$10.95 monthly.

Pay Service 3

Pay Units: 2,146 (06/05/97).

Programming (via satellite): HBO (multiplexed).

Fee: \$10.95 monthly.

Pay Service 4

Pay Units: 1,480 (06/05/97).

Programming (via satellite): Showtime.

Fee: \$10.95 monthly.

Pay Service 5

Pay Units: 547 (06/05/97).

Programming (via satellite): The Movie Channel.

Fee: \$10.95 monthly.

Pay-Per-View

Addressable homes: 7,785 (06/05/97). Viewers Choice 1 & 2; Playboy TV.

Fee: \$3.95.

Local advertising: Planned.

Equipment: Phasecom & Scientific-Atlanta headend; Texcan amplifiers; Comm/Scop cable; Hitachi cameras; NEC VTRs; Video Data Systems character generator; Scientific-Atlanta set top converters; Scientific-Atlanta addressable set top converters; Hughes & Scientific-Atlanta satellite antenna; Hughes & Scientific-Atlanta satellite receivers.

Miles of plant: 374.0 (coaxial). Additional miles planned: 5.0 (coaxial). Homes passed: 15,000. Total homes in franchise area: 30,000.

City fee: 5% of gross.

Ownership: Insight Communications Co. (MSO).

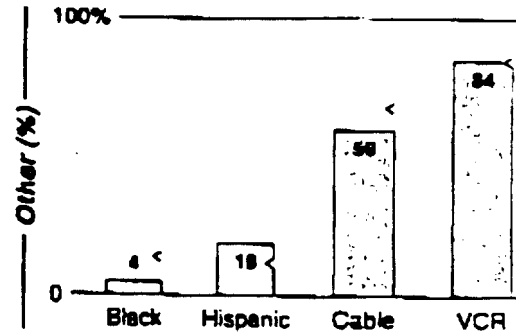
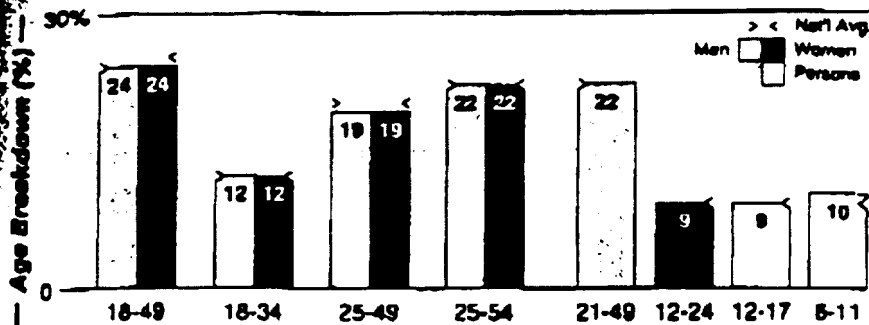
PIMA COUNTY—Jones Intercable, 8251 N. Cortaro Rd., Tucson, AZ 85743-9599. Phone: 520-744-2653. Fax: 520-744-4737. Counties: Pima & Pinal. Also serves Avra Valley (portions), Catalina (portions), Marana, Oro Valley. ICA: AZ0003.

TV Market Ranking: Below 100 (Avra Valley, Catalina, Marana, Oro Valley, portions of Pima County); Outside TV Markets (portions of Pima County). Franchise award date: August 1, 1979. Franchise expiration date: July 1, 1997. Began: July 1, 1982.

Exhibit 4

Phoenix

DMA Rank: 17 TVHH: 1,289,000 Pop: 3,517,500 Retail: \$35,500B Gross Rev: \$328.3M HH Inc: \$37,943 ↓

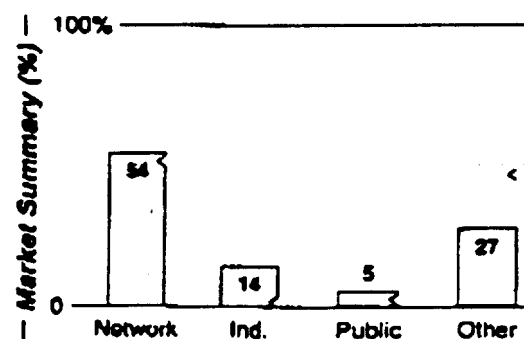
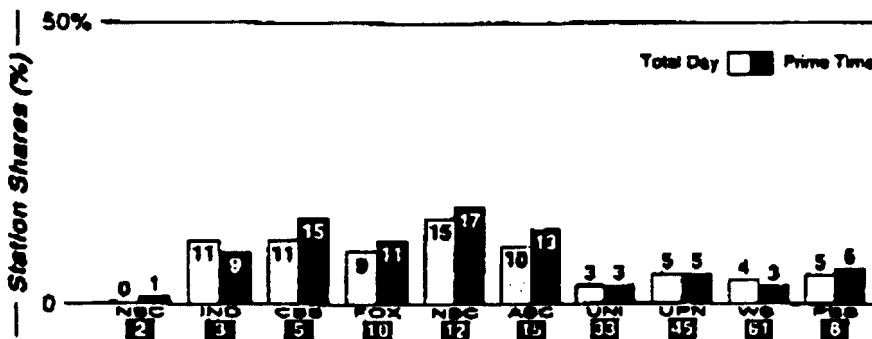


Ch	p	Calls	City of License	PWR	HAAT	Polar	Latitude	Longitude	Rep	Affil	St	Owner	Acq	Price
2		KNAZ	Flagstaff	100	1,601	HOR	34-58-06	111-30-28	Katz	NBC	70	Gannett Co Inc	9705	6,250 c1
3		KTVK	Phoenix	100	1,778	HOR	33-20-01	112-03-45	TelRp	IND	55	Media America Corp	7706	5,907
5		KPHO	Phoenix	100	1,772	HOR	33-20-02	112-03-40	HAP	CBS	49	Meredith Corp	5206	g
6		KMOH	Kingman	100	1,919	HOR	35-01-57	114-21-58		WB	68	Gannett Co Inc	9705	c1
7		KUSK	Prescott	9	2,809	HOR	34-41-15	112-07-01		IND	82	KUSK Inc		
8		KAET	Phoenix	316	1,756	HOR	33-20-00	112-03-49		PBS	61	AZ State University		
10		KSAZ	Phoenix	316	1,828	CIR	33-20-03	112-03-43	Petry	FOX	53	Fox Television	9701	g
12		KPNX	Mesa	316	1,782	HOR	33-20-00	112-03-48	Blair	NBC	53	Gannett Co Inc	7906	
13		KBPX	Flagstaff	280	1,555	HOR	34-58-06	111-30-29		INF	92	Paxon Comm Corp	9607	g
15		KNXV	Phoenix	537	1,709	HOR	33-20-00	112-03-46	Katz	ABC	79	Scripps Howard Bcstg	8501	26,500
21		KPAZ	Phoenix	1,290	1,804	HOR	33-20-03	112-03-42		REL	67	Trinity Bcstg Ntwk	7707	
33		KTVW	Phoenix	2,290	1,673	HOR	33-20-00	112-03-46	UNI	UNI	79	Univision TV Group	9212	g
45		KUTP	Phoenix	2,750	1,788	HOR	33-20-01	112-03-32		UPN	85	United Television		
61		KASW	Phoenix	2,510	1,775	HOR	33-20-00	112-03-44		WB	95	Brooks Bcstg		

CP's: Ch 4, Flagstaff; Ch 11, Holbrook; Ch 34, Lake Havasu City; Ch 51, Tolleson

Allocations: Ch 9, Flagstaff

Ch	General Manager	Address, City, State ZIP	Phone	FAX	Owner Contact	Owner Phone
2	Dan Robbins	PO Box 3360, Flagstaff, AZ 86003	520-526-2232	526-8110	Cecil Walker	703-284-6000
3	Bill Miller	5555 N 7th Avenue, Phoenix, AZ 85013	602-207-3333	207-3377	Delbert R. Lewis	
5	Patrick North	4016 N Black Canyon Hwy, Phoenix, AZ 85017	602-284-1000	241-8871	John Loughlin	515-284-3717
6	Dan Robbins	2160 S Highway 95 # 8, Bullhead City, AZ 86442	520-758-7333	758-8139	Cecil Walker	703-284-6000
7	Richard Howe	3211 Tower Rd, Prescott, AZ 86301	520-778-6770	445-5210	William H. Sauro	520-778-6770
8	Charles R. Allen	PO Box 871405, Tempe, AZ 85287	602-965-3508	965-1000	Charles R. Allen	602-965-3508
10	Laureen Ong	511 W Adams St, Phoenix, AZ 85003	602-257-1234	262-0177	Mich Stern	310-584-2000
12	Colleen Brown	PO Box 711, Phoenix, AZ 85001	602-257-1212	257-6519	Cecil Walker	703-284-6000
13	Janine Topell	2158 N 4th St, Flagstaff, AZ 86004	520-527-1300	527-1394	Jay Hoker	581-659-4122
15	Brad Nilsen	4825 S 33rd Pl, Phoenix, AZ 85040	602-243-4151	304-3000	James M. Hart	513-977-3000
21	Paul Crouch	3551 E McDowell Rd, Phoenix, AZ 85008	602-273-1477	267-9427	Paul F. Crouch	949-832-2950
33	Ruben Luers	3019 E Southern Ave, Phoenix, AZ 85040	602-243-3333	276-8658	A. Jamold Paranchio	310-558-7600
45	Bob Furlong	4630 S 33rd St, Phoenix, AZ 85040	602-268-4500	276-4062	Evan C. Thompson	310-281-4844
61	Bill Miller	5555 N 7th Avenue, Phoenix, AZ 85013	602-661-6161	207-3277	Gregory R. Brooks	602-207-3261



BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date
9809218835239012	MULTIMEDIA INC 2201 N VICKEY STREET FLAGSTAFF AZ 86004	FCC2055973	09/17/98

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$31,451.00	\$31,451.00	2	MUB8	1	KC26141	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	1	MBV8	1	KNAZTV	MULTIMEDIA INC	86004		\$31,275.00	1	PMT
\$31,451.00	\$31,451.00	4	MUB8	1	WDF40	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	5	MUB8	1	WDF41	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	8	MUB8	1	WLI409	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	9	MUB8	1	WLI410	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	10	MUB8	1	WLI411	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	11	MUB8	1	WLI412	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	12	MUB8	1	WLI413	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	13	MUB8	1	WLI415	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	14	MUB8	1	WLI416	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	15	MUB8	1	WLI417	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	16	MUB8	1	WLI418	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	17	MUB8	1	WLI419	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	6	MUB8	1	WMU809	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	7	MUB8	1	WMU810	MULTIMEDIA INC	86004		\$11.00	1	PMT
\$31,451.00	\$31,451.00	3	MUB8	1	WMV291	MULTIMEDIA INC	86004		\$11.00	1	PMT
Total		17							\$31,451.00		